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May 24, 2023

VIA CM/ECF

Honorable James B. Clark, III
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

RE: *Matthew Donohue v. Capella University, LLC, et al*
Case No. 2:22-cv-5634 (CCC) (JBC)

Dear Judge Clark,

I represent the Plaintiff in the above reference matter. I am writing in regard to Defendant's request for a confidentiality order.

Good Cause Does Not Exist for Entry of a Discovery Confidentiality Order.

As the Defendants point out, documents containing private student information (including those of Plaintiff) are federally protected under the Family Educational Rights and Privacy Act (FERPA) under 20 U.S.C. § 1232, *et seq.*

Additionally, it is Plaintiff's belief that the sole reason Defendants are seeking to have a confidentiality order put in place is to strictly limit their exposure to any and all wrongdoing that is at the heart of Plaintiff's litigation arguments in this matter.

Therefore, for the reasons stated above, Plaintiff believes entry of the Defendants proposed Discovery Confidentiality Order is not appropriate or necessary in this case.

Respectfully,

THE LAW OFFICE OF KEITH ALTMAN

A handwritten signature in black ink, appearing to be "Keith Altman", written over a horizontal line.

Keith Altman, Esq.

Honorable James B. Clark, III

May 24, 2023

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cc: Heather Weine Brochin, Esq.
Cicely Miltich, Esq.
Dion Farganis, Esq.
Solomon Mordechai Radner, Esq.